

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

AUSTIN VAN OVERDAM,  
Plaintiff,

v.

TEXAS A&M UNIVERSITY,  
Defendant.

§  
§  
§  
§  
§  
§  
§

CIVIL NO. 4:18-cv-02011

---

**DEFENDANT’S UNOPPOSED MOTION  
TO WITHDRAW AND SUBSTITUTE LEAD COUNSEL**

---

Defendant, Texas A&M University (“Defendant” or “TAMU”), files this Unopposed Motion to Withdraw and Substitute Lead Counsel. In support, Defendant states the following:

1. Assistant Attorney General Cristina M. Moreno is currently listed as lead counsel for Defendant, and Assistant Attorney General Rola Daaboul as co-counsel in the above-captioned cause.

2. There is good cause to withdraw Ms. Moreno as lead counsel for Defendant because Ms. Moreno has accepted a position outside the Office of the Attorney General of Texas. The withdrawal will not delay these proceedings.

3. Defendant request that Ms. Daaboul be substituted as lead counsel for Defendant in this matter.

4. Ms. Moreno should be removed from all correspondence and notifications in this matter.

For the foregoing reasons, Defendant respectfully requests that the Court grant this motion to withdraw Assistant Attorney General Cristina M. Moreno as lead counsel and substitute Assistant Attorney General Rola Daaboul in the above-captioned cause.

Respectfully submitted,

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

GRANT DORFMAN  
Deputy First Assistant Attorney General

SHAWN COWLES  
Deputy Attorney General for Civil Litigation

THOMAS A. ALBRIGHT  
Chief – General Litigation Division

/s/ Cristina M. Moreno  
CRISTINA M. MORENO  
Texas Bar No. 24105023  
ROLA DAABOUL  
Texas Bar No. 24068473  
Assistant Attorneys General  
Office of the Attorney General  
General Litigation Division  
P.O. Box 12548, Capitol Station  
Austin, TX 78711-2548  
(512) 475-4072 PHONE  
(512) 320-0667 FAX  
[cristina.moreno@oag.texas.gov](mailto:cristina.moreno@oag.texas.gov)  
[rola.daaboul@oag.texas.gov](mailto:rola.daaboul@oag.texas.gov)  
**ATTORNEYS FOR STATE DEFENDANTS**

**CERTIFICATE OF CONFERENCE**

I hereby certify that Plaintiff's counsel, has been contacted regarding this motion and he has advised that he is unopposed.

/s/ Cristina M. Moreno  
CRISTINA M. MORENO  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I hereby certify that on February 12, 2021 a true and correct copy of the foregoing document was served via the Court's CM/ECF system to all counsel of record.

Gaines West  
John "Jay" Rudinger, Jr.  
Kyle Carney  
West, Webb, Allbritton & Gentry, P.C.  
1515 Emerald plaza  
College Station, TX 77845-1515  
Phone: 979-694-7000  
Fax: 979-694-8000  
[Gaines.west@westwebblaw.com](mailto:Gaines.west@westwebblaw.com)  
[Jay.rudinger@westwebblaw.com](mailto:Jay.rudinger@westwebblaw.com)  
[kyle.carney@westwebblaw.com](mailto:kyle.carney@westwebblaw.com)

/s/ Cristina M. Moreno  
CRISTINA M. MORENO  
Assistant Attorney General